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19 UNITED STATES DISTRICT COURT
20 DISTRICT OF NEVADA

21 UNITED STATES OF AMERICA,
22 Plaintiff,
23 v.
24 SANDRA DeFORREST,
25 Defendant.

Case No. 2:17-cv-3048-GMN-GWF

**STIPULATION AND ORDER FOR AN
EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR PARTIAL
SUMMARY JUDGMENT**

(First Request)

Honorable Chief Judge Gloria M. Navarro
Magistrate Judge George Foley, Jr

1 In accordance with the U.S. District of Nevada, Local Rule IA 6-1, the United States of
2 America (the “United States”) and Sandra De Forrest (“Defendant”) (together, the “Parties”), by
3 and through their undersigned counsel, hereby submit this Stipulation for an Extension of Time
4 to Respond to Plaintiff’s Motion for Partial Summary Judgment (filed on May 6, 2019), to July
5 26, 2019. This is the first stipulation for an extension of time to file a response to said motion.
6 For the reasons set forth in further detail below, the Parties respectfully submit that good cause
7 exists to extend the current, scheduled response deadline.

9 1. Pursuant to this Court’s Order granting the United States’ Motion to Lift Stay and
10 Reset Deadlines, the Dispositive Motion Deadline was reset from March 7, 2019 to May 7, 2019.
11 See Dkt. # 25.

12 2. On May 6, 2019, the United States filed a Motion and Memorandum for Partial
13 Summary Judgment. See Mot. And Mem. for Partial Summ. J. (Dkt. #26). Plaintiff’s Motion
14 requests that the “Court find, as a matter of law, that the Defendant’s failure to file Form 90-22.1
15 (“FBAR”) for 2005 was willful.” See id.

17 3. Defendant’s position is that Plaintiff’s motion raises several complex legal and
18 factual issues that are at the crux of this litigation and that significant time and resources will be
19 required to prepare a response. The Parties have mutually agreed that, under the circumstances,
20 the proposed extension of time for Defendant to file a response is both reasonable and
21 appropriate.

23 4. Further, on May 8, 2019, the Honorable Chief Judge Gloria M. Navarro referred
24 this matter to Magistrate Judge George W. Foley, Jr. for a settlement conference. See Dkt. #27.
25 Judge Foley subsequently scheduled a settlement conference on June 20, 2019. See Dkt. #28.

1 However, due to a scheduling conflict with Plaintiff's counsel,¹ Plaintiff will be separately
2 moving to reschedule the settlement conference to a later date. As such, extending the current
3 deadline for Defendant to file its response until after the anticipated settlement conference date
4 would have the further benefit of avoiding potentially unnecessary legal work by Defendant in
5 the event that a settlement is reached at the conference and, in the interim, would allow the
6 parties to focus their attention on settlement efforts.
7

8 5. Throughout this litigation, the Parties have worked together diligently and
9 collaboratively to meet each of their respective Court obligations. As such, this requested
10 extension will not prejudice the timely, orderly, and efficient resolution of issues.

11 WHEREFORE, the Parties hereby stipulate and agree to this extension of time for
12 Defendant to respond to Plaintiff's Motion for Partial Summary Judgment, and respectfully
13 request that this Court grant this stipulation and extend Defendant's time to respond to said
14 motion from the current scheduled date of May 27, 2019 to July 26, 2019.
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16 IT IS SO STIPULATED.

17 Respectfully submitted this 13th day of May, 2019.

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19 /s/ Brian C. McManus
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23 IT IS SO ORDERED:

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25 /s/ Rick Watson
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28 
Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT

29 DATED this 13 day of May, 2019.

30 ¹ Plaintiff's counsel's son is scheduled to graduate from High School on that date.